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Attorneys for Defendant APPLE INC.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

EPIC GAMES, INC.

Case No. 4:20-cv-05640-YGR-TSH

Plaintiff, Counter-defendant

**EXHIBIT A (REDACTED) TO
DECLARATION OF MARK A. PERRY IN
SUPPORT OF APPLE INC.'S STATEMENT
IN SUPPORT OF ADMINISTRATIVE
MOTION TO SEAL**

APPLE INC.

The Honorable Thomas S. Hixson

EXHIBIT A (REDACTED)

CASE NO. 4:20-CV-05640-YGR-TSH

EXHIBIT A

(Unredacted)

Production Dates of Parent Document (Folder Title)	Doc Number	Production Beginning Dates	Production End Dates	Document Date	Document Time	From	To	Cc	Bcc	Subject	Original Name	Redact or Withhold	Privilege Type	Privilege Description	Additional Privilege Context	Attorneys, Legal Staff, and Employees Acting at the Direction of Counsel	SPECIAL MASTER RULING	Optional Special Master Notes
PRIV-APL-EG_00255272	10781	PRIV-APL-EG_00255272	PRIV-APL-EG_00255281	2022-02-10	00:08:46	Ann Thai	Eddy Cue	Kyle Andeer ; Kate Adams ; Tim Cook ; Phil Schiller ; Craig Fedenghi ; Greg (Joz) Joswiak ; Luca Maestri ; Lisa Jackson ; Kristin Huguet ; Jeff Robbin ; Sean Cameron ; Matt Fischer ; Sean Dillon ; Susan Prescott ; Trystan Kosmyntka ; Jason Cody ; Nick Ammann ; Tim Powderly ; Fred Sainz ; Robert Windom		Re: Reuters - Dutch watchdog fines Apple \$5.7 million again in App Store dispute	357208.emlx	Withhold	Attorney Client	Email chain reflecting information necessary for the purpose of rendering legal advice from counsel regarding foreign regulatory issues in the Netherlands for dating apps.	Document reflects information necessary for the rendering of legal advice from Apple legal	Jason Cody (Apple in-house counsel); Sean Cameron (Apple in-house counsel); Kyle Andeer (Apple in-house counsel)	yes as to kyle andeer email in chain. No as to the rest. It is predominantly business/PR	
PRIV-APL-EG_00256631	10886	PRIV-APL-EG_00256631	PRIV-APL-EG_00256640	2022-02-09	22:54:07	Eddy Cue	Ann Thai	Phil Schiller ; Kyle Andeer ; Tim Cook ; Craig Fedenghi ; Greg (Joz) Joswiak ; Kate Adams		Re: Reuters - Dutch watchdog fines Apple \$5.7 million again in App Store dispute	20220209-1454 Re: Reuters - Dutch watchdog fines Apple \$5.7 million again.eml	Withhold	Attorney Client	Email chain reflecting information necessary for the purpose of rendering legal advice from counsel regarding foreign regulatory issues in the Netherlands for dating apps.	Document reflects information necessary for the rendering of legal advice from Apple legal	Jason Cody (Apple in-house counsel); Sean Dillon (Apple in-house counsel); Kate Adams (Apple in-house counsel); Kyle Andeer (Apple in-house counsel)	yes as to kyle andeer email in chain. No as to the rest. It is predominantly business/PR	

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								<p>Luca Maestri</p> <p>Lisa Jackson</p> <p>; Kristin Huguet</p> <p>Jeff Robbin</p> <p>Sean Cameron</p> <p>Matt Fischer</p> <p>; Sean Dillon</p> <p>Susan Prescott</p> <p>Trystan Kosmynka</p> <p>Jason Cody</p> <p>Nick Ammann</p> <p>Tim Powderly</p> <p>Fred Sainz</p> <p>; Robert Windom</p>										
PRIV-APL-EG_00256780	10904	PRIV-APL-EG_00256780	PRIV-APL-EG_00256789	2022-02-09	22:31:21	Phil Schiller	Ann Thai	Eddy Cue ; Kyle Andeer Tim Cook ; Craig Federighi ; Gregory Joswiak ; Luca Maestri ; Lisa Jackson ; Kristin Huguet Quayle Jeff Robbin		Re: Reuters - Dutch watchdog fines Apple \$5.7 million again in App Store dispute	20220209-1431 Re: Reuters - Dutch watchdog fines Apple \$5.7 million again.eml	Withhold	Attorney Client	Email chain reflecting information for the purpose of obtaining legal advice from counsel regarding foreign regulatory issues in the Netherlands for dating apps.	Document reflects information necessary for the obtaining of legal advice from Apple legal.	Sean Dillon (Apple in-house counsel); Sean Cameron (Apple in-house counsel); Kate Adams (Apple in-house counsel); Kyle Andeer (Apple in-house counsel)	yes as to kyle andeer email in chain. No as to the rest. It is predominantly business/PR	

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								<p>; Sean Cameron</p> <p>Matt Fischer</p> <p>Sean Dillon</p> <p>Susan Prescott</p> <p>Trystan Kosmyntka</p> <p>Jason Cody</p> <p>Nick Ammann</p> <p>Tim Powderly</p> <p>Fred Sainz</p> <p>Robert Windom</p>										
PRIV-APL-EG_00272830	12136	PRIV-APL-EG_00272830	PRIV-APL-EG_00272842	2023-07-03	23:01:55	Jennifer Brown	Richman, Cynthia	Carson Oliver <p>Phillips, Harry R. S.</p> <p>Timothy Kim</p> <p>Ann Thai</p> <p>Jeff Wilder</p> <p>Tanya Washburn</p> <p>Sean Cameron</p> <p>Ling Lew</p> <p>Kleinbrodt, Julian Wolfe</p> <p>Sean Dillon</p> <p>Brendan McNamara</p>	Re: Analysis Group Work	20230703-1602 Re: Analysis Group Work.eml	Redact	Work Product	Email chain with redacted text reflecting work product prepared by counsel regarding injunction compliance and U.S. Link Entitlement program eligibility, prepared in anticipation or furtherance of litigation.	Jennifer Brown (Apple in-house counsel); Ling Lew (Apple in-house counsel); Sean Cameron (Apple in-house counsel); Sean Dillon (Apple in-house counsel); Brendan McNamara (Apple in-house counsel)	no	predominantly business		

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PRIV-APL-EG_00228712	7905	PRIV-APL-EG_00228712	PRIV-APL-EG_00228714	2023-07-11	16:29:02	Mami Goldberg	Carson Oliver	Fred Sainz [REDACTED]; Jennifer Brown [REDACTED]; Sean Cameron [REDACTED]; Ling Lew [REDACTED]; Ann Thai [REDACTED]	Tough Q and A.eml	Tough Q and A.eml	Withhold	Attorney Client; Work Product	Email providing information for the purpose of obtaining legal advice prepared by employees acting under the direction of counsel regarding injunction compliance press and communications legal strategy, prepared in anticipation or furtherance of litigation.		Sean Cameron (Apple in-house counsel); Jennifer Brown (Apple in-house counsel); Ling Lew (Apple in-house counsel)	NO	SEE JUDGE HIXSON ORDER, DKT. NO. 1056, 12/02/04, AT 3 (REVIEW OF APL-EG-010681518) "THIS DOCUMENT IS A DRAFT OF A PRESS BRIEFING . . . THE CASE SUMMARIES DO NOT CONTAIN LEGAL ADVICE, NOR ASK FOR IT. . . THIS IS A DRAFT OF A CASE SUMMARY TO BE PROVIDED EXTERNALLY TO THE PRESS. . . NOTHING IN THE DOCUMENT IS LEGAL ADVICE." JUDGE GONZALEZ-ROGERS UPHELD THIS RULING ON DECEMBER 31, 2024. THESE RULINGS APPLY TO THIS DOCUMENT AND THEREFORE IT MUST BE PRODUCED. THE DOCUMENT DOES NOT REQUEST LEGAL ADVICE NOR DOES IT REPEAT LEGAL ADVICE. IT	

Production Dates of Parent Document (Folder Title)	Doc Number	Production Beginning Dates	Production End Dates	Document Date	Document Time	From	To	Cc	Bcc	Subject	Original Name	Redact or Withhold	Privilege Type	Privilege Description	Additional Privilege Context	Attorneys, Legal Staff, and Employees Acting at the Direction of Counsel	SPECIAL MASTER RULING	Optional Special Master Notes
																	DOES NOT REFLECT ATTORNEY WORK PRODUCT. THE DOCUMENT REFLECTS PREPARED RESPONSES TO BE PRESENTED TO QUESTIONS FROM THE PRESS.	
PRIV-APL-EG_00216707	6755	PRIV-APL-EG_00216707	PRIV-APL-EG_00216712	2024-01-21	19:22:54	Sean Cameron	Philip Schiller	Eddy Cue [REDACTED]; Greg (Joz) Joswiak [REDACTED]; Matt Fischer [REDACTED]; [REDACTED]; Josh Shaffer [REDACTED]; Fred Sainz [REDACTED]; Andreas Wendker [REDACTED]; Bob Borchers [REDACTED]; [REDACTED]; Ann Thai [REDACTED]; Susan Prescott [REDACTED]; Carson Oliver [REDACTED]; Ling Yang Lew [REDACTED]; Jason Cody [REDACTED]; Pam Reid [REDACTED]; Kyle Andeer [REDACTED]; Brendan McNamara [REDACTED]; [REDACTED]; Trystan Kosmynka [REDACTED]	Re: Guidelines -- DMA edits	20240121-1123 Re: Guidelines -- DMA edits.eml	Withhold	Attorney Client	Email chain reflecting legal advice from counsel regarding injunction compliance for developer guidelines and website materials prepared in anticipation or furtherance of litigation.		Sean Cameron (Apple in-house counsel); Ling Lew (Apple in-house counsel); Brendan McNamara (Apple in-house counsel)	NO	NO REDACTIONS IDENTIFIED ON THE DOCUMENT	

Production Dates of Parent Document (Folder Title)	Doc Number	Production Beginning Dates	Production End Dates	Document Date	Document Time	From	To	Cc	Bcc	Subject	Original Name	Redact or Withhold	Privilege Type	Privilege Description	Additional Privilege Context	Attorneys, Legal Staff, and Employees Acting at the Direction of Counsel	SPECIAL MASTER RULING	Optional Special Master Notes	
PRIV-APL-EG_00118829	85	PRIV-APL-EG_00118829	PRIV-APL-EG_00118832	2022-04-11	17:36:51	Casey Eason	Nate Barton	Mahesh Damodaran	Fwd: Legal Request - App Store P&L	20220411-1036 Fwd: Legal Request - App Store P&L.eml		Redact	Attorney Client	Email chain with redacted text reflecting legal advice and related requests from counsel concerning app store profits/losses data for purposes of preparing a court filing.	Email from Apple employee requesting information on behalf of Apple in-house counsel for the purposes of rendering legal advice.	Email from Apple employee requesting information on behalf of Apple in-house counsel for the purposes of rendering legal advice.	No		
PRIV-APL-EG_00119866	184	PRIV-APL-EG_00119866	PRIV-APL-EG_00119872	2023-09-11	22:03:20					1 Pager - AU Online Safety Act.pdf		Redact	Attorney Client	Document with redacted text reflecting legal advice from counsel regarding foreign regulatory issues press and communications legal strategy	Chat messages and notes summarizing discussions with in-house counsel re Australia's Online Safety Act.	Document includes summaries of conversations with Apple in-house counsel containing legal advice.	No		
PRIV-APL-EG_00125518	535	PRIV-APL-EG_00125518	PRIV-APL-EG_00125530	2022-01-28	15:50:43	Hannah Smith	Marni Goldberg marni_goldberg@apple.com			Re: Epic Amicus Filings Plan -- privileged and confidential	20220128-0750 Re: Epic Amicus Filings Plan -- privileged and confidential.eml		Redact	Attorney Client; Work Product	Email chain with redacted text providing legal advice from counsel regarding ongoing Epic litigation prepared in anticipation or furtherance of litigation.	Reflects summary of briefing papers in ongoing Epic litigation.	Gibson Dunn (outside counsel); Kate Adams (Apple in-house counsel); Kyle Andeer (Apple in-house counsel); Jennifer Brown (Apple in-house counsel); Sean Cameron (Apple in-house counsel).	No	